

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ESSAR STEEL ALGOMA, INC.,
Plaintiff,

v.

SOUTHERN COAL SALES
CORPORATION *et al.*,

Defendants.

Case No. 17-mc-00360-AT-RWL

NOTICE OF MOTION TO WITHDRAW AS COUNSEL

Pursuant to Local Rule 1.4 and Rule 1.16(c) of the New York Rules of Professional Conduct, Kelley Drye & Warren LLP, respectfully moves this Court for an order granting leave to withdraw as counsel of record for Defendants Nevada Holdings, Inc. (formerly Southern Coal Sales Corporation); James C. Justice Companies, Inc.; James C. Justice Companies, LLC; Bluestone Industries, Inc.; Bluestone Coal Corporation; Bluestone Mineral, Inc.; Bluestone Energy Sales Corporation; A&G Coal Corporation; Tams Management Inc.; Encore Leasing LLC; Bluestone Resources Inc.; Justice Family Farms, LLC; and Southern Coal Corporation in the above-captioned case.

Kelley Drye respectfully requests that the Court issue an Order: (i) permitting Kelley Drye and each of its members, counsel, and associated lawyers that have appeared in this action to immediately withdraw as counsel for Defendants; and (ii) granting Kelley Drye such other and further relief as the Court deems just and proper.

Dated: New York, New York
July 9, 2019

Respectfully submitted,

KELLEY DRYE & WARREN LLP

By: s/ Philip D. Robben
Philip D. Robben

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